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→ Tom

teckcominco

David W. Godlewski
Manager, Environmental and Public Affairs

May 2, 2003

Mr. Thomas Eaton
U.S. EPA Region X
1200 Sixth Ave
Seattle, WA 98101

Dear Mr. Eaton:

You have asked that I provide additional details about the approach that the Upper Columbia Working Group for Responsible Stewardship (Working Group) has recently announced and asked Teck Cominco American Incorporated (TCAI) to help fund. The approach was discussed in some detail at the recent meeting of the Lake Roosevelt Forum. The Working Group intends to put together a Technical Team that will include experts from a variety of sources, including a Washington state university. The Technical Team will use this framework to develop detailed scope and work plans to ensure the credibility of any work done. Such plans should be produced by the Working Group within a matter of weeks.

The framework proposal currently being considered by the Working Group consists of the following components:

(1) Field investigation water--assesses the presence of metals in water.

- Conduct a study to assess water quality for the presence of metals at various key locations in the Upper Columbia (from the border to the Grand Coulee Dam).
- Identify sample location based on potential for human intake--locations used for drinking water for municipalities and individual homes on selected irrigation waters and on key recreational areas.
- Focus measurement parameters on those that could potentially be impacted by metals-contaminated sediment, i.e. total and dissolved metals levels.
- Design study so that grab samples are collected once every two months over the course of the year.
- Utilize accepted sampling and QA/QC techniques.
- Data to be reported by the study oversight group and in comparison to established regulatory water quality standards (e.g., EPA, DOE) for various uses (aquatic life, drinking, irrigation, recreation etc). The data should also integrate other existing water quality data from the river/lake including key inputs such as the Kettle and Spokane Rivers.

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(2) Fish tissue monitoring--consists of a study of the presence of metals present in the tissues of game fish.
Fish tissue studies for the presence of metals were conducted by the USGS in 1994 and again in 1998. The timing is appropriate to conduct a comprehensive fish tissue study for metals for a range of locations and fish species. For example,

- Sample various walleye life stages.
- Sample additional sport fish species (other than walleye) to get a better representation of what anglers may be consuming.
- Utilize accepted sampling and QA/QC techniques.
- Report results including comparisons with; (i) results from previous studies of the river and lake, (ii) results from other sites in Washington and the US, (iii) established standards & objectives for metals levels in fish tissue, and (iv) exposure calculations and risk estimates for human consumers of fish.

(3) **Study of potential human exposure to metals-containing sediment on beaches and river banks.**
The emphasis of such a study would be on Lead as the level of other contaminants of potential concern is relatively much lower (from a human health perspective). Include screening level assessments for other metals to validate this assumption.

With an emphasis on assessing Lead exposures this study could include:

- Characterization (sampling & mapping) of sediment concentration for major recreational areas. Identification of screening locations for Pb, As, Cd, and Cu.
- Conduct soil and dust sediment sampling in the residential areas (also utilizing data from the current USGS study of dust dispersal to assess impact of dust deposition due to Federal Dam management water drawdown).
- Assessment of exposure for various groups including recreational users and local area residents.
- A blood lead level study for local communities and/or major recreational users

We are told that the Working Group's studies will be guided by an Executive Board, which consists of the Commissioners of Ferry, Lincoln, Grant, Stevens, Pend Oreille and Okanogan Counties. The goal of the group is to be inclusive and we believe that invitations to participate will be extended to various parties. Study results will be shared directly with EPA and will be provided and publicized to any other groups or individuals with an interest in the subject.

The Working Group is assessing the framework, will be incorporating ideas from a variety of sources, and will soon issuing detailed study plans. We hope that the efforts of

the group will provide a basis for continued cooperative efforts with regard to the Lake and to addressing the concerns of the citizens who rely and recreate on it. We ask that you give them time to develop their proposal and that you strongly consider their approach

We believe that this approach quickly and independently obtains pertinent information about the potential impacts associated with the Upper Columbia River and Lake Roosevelt. These are questions of great importance to the residents of the region. It avoids the inherent delays and difficult jousting associated with the initiation of the CERCLA process and provides relatively quick answers to pertinent data gaps. It also avoids unnecessarily labeling one the nation's unique and most beautiful resources as a "Superfund" site. EPA will inherently be very involved in the process and will be in position to quickly access the useful data that is generated.

Please give me a call to discuss this proposal in more detail. Thanks much for talking with me.

Sincerely,

David W. Godlewski
Manager, Environmental and Public Affairs

DWG:ds